

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OKLAHOMA

VIDEO GAMING TECHNOLOGIES,
INC.,

Plaintiff,

v.

CASTLE HILL STUDIOS LLC, *et al.*

Defendants.

CASE NO. 17-CV-00454-GKF-JFJ

**DEFENDANTS' MOTION TO EXPEDITE RULING FOR RELIEF UNDER
PROTECTIVE ORDER AND OTHER RELIEF**

Defendants, Castle Hill Studios LLC, Castle Hill Holdings LLC, and Ironworks Development LLC (collectively, "Castle Hill"), move to expedite the briefing schedule and ruling for its motion for relief under the Stipulated Protective Order (Doc. 55) ("Protective Order"), filed concurrently herewith (the "Motion").

As set forth in the Motion, Castle Hill requests the ability to share certain specific information which VGT has designated under the Protective Order as confidential, highly confidential, or highly confidential source code under the Protective Order with specific Castle Hill personnel so as to allow Castle Hill to adequately prepare for trial.

Castle Hill requests that the Court expedite the briefing schedule so as to allow the Court to provide its ruling in advance of the Pretrial Conference scheduled for September 3, 2019. *See* Doc. 312. Castle Hill is currently preparing for trial, and as set forth in the Motion, the inability to share the designated information with Castle Hill will prejudice the defense. In order to provide Castle Hill sufficient time to adequately prepare for trial with the designated materials, Castle Hill respectfully requests expedited consideration of its Motion.

Dated: August 6, 2019

Respectfully submitted,

/s/ Robert C. Gill

Robert C. Gill (admitted *pro hac vice*)
Henry A. Platt (admitted *pro hac vice*)
Thomas S. Schaufelberger (admitted *pro hac vice*)
Sherry H. Flax (admitted *pro hac vice*)
Matthew J. Antonelli (admitted *pro hac vice*)
Jeremy B. Darling (admitted *pro hac vice*)
SAUL EWING ARNSTEIN & LEHR, LLP
1919 Pennsylvania Avenue, NW, Suite 550
Washington, D.C. 20006
(202) 295-6605
(202) 295-6705 (facsimile)
robert.gill@saul.com
henry.platt@saul.com
tschauf@saul.com
sherry.flax@saul.com
matt.antonelli@saul.com
jeremy.darling@saul.com

James C. Hodges, OBA #4254
JAMES C. HODGES, P.C.
2622 East 21st Street, Suite 4
Tulsa, Oklahoma 74114
(918) 779-7078
(918) 770-9779 (facsimile)
JHodges@HodgesLC.com

Counsel for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on this 6th day of August, 2019, I caused a copy of the foregoing **DEFENDANTS' MOTION TO EXPEDITE RULING FOR RELIEF UNDER PROTECTIVE ORDER AND OTHER RELIEF** to be filed via the Court's ECF system, which will provide electronic notification of filing to the following counsel for Plaintiff:

Graydon Dean Luthey, Jr.
GABLE GOTWALS
1100 ONEOK Plaza
100 West Fifth Street
Tulsa, OK 74103-4217
(918) 595-4821
(918) 595-4990 (facsimile)
dluthey@gablelaw.com
Counsel for Plaintiff

Neil K. Roman
COVINGTON & BURLING LLP
The New York Times Building
620 Eighth Avenue
New York, NY 10018-1405
(212) 841-1221
(212) 841-1010 (facsimile)
nroman@cov.com
Counsel for Plaintiff

Gary M. Rubman
Peter Swanson
Rebecca B. Dalton
COVINGTON & BURLING LLP
One City Center
850 Tenth Street, NW
Washington, DC 20001-4956
(202) 662-6000
(202) 778-5465 (facsimile)
grubman@cov.com
pswanson@cov.com
rdalton@cov.com
Counsel for Plaintiff

/s/ Robert C. Gill
Robert C. Gill